



# **Illinois Department of Transportation**

2300 South Dirksen Parkway / Springfield, Illinois / 62764

## **BDE PROCEDURE MEMORANDUM**

**NUMBER:** 25-01

**SUBJECT:** In-Stream Work and Erosion Control for Bridges/Culverts

**DATE:** September 19, 2001

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This memorandum supplements the information in Sections 28-2 (Federal Permits/Certifications), 39-3 (Bridge Planning Process), and 59-8 (Erosion and Sediment Control) of the BDE Manual. The changes in procedures described in this memorandum will be incorporated in the Manual in the next update.

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### **Background**

As a part of the IDOT/FHWA Joint Process Review Program, a joint Quality Improvement Team (QIT) in 2000 conducted a review of the Department's implementation of erosion and sediment control measures pursuant to Construction Memorandum 98-60 (replaced by Construction Memorandum 00-60) and BDE Procedure Memorandum 98-32 (incorporated in Section 59-8 of the BDE Manual). In addition, the QIT evaluated the Department's compliance with commitments for erosion and sediment control associated with permits (e.g., Section 404 and National Pollutant Discharge Elimination System [NPDES]) and other regulatory requirements. Among the findings of the process review, the QIT determined that erosion and sediment control measures often were not being provided for bridge/culvert work associated with a project. The team also found inadequacies in the disclosure of temporary in-stream work (temporary stream crossings, cofferdams, work pads, etc.) in submittals for Section 404 permits. This memorandum is intended to respond to the process review findings by clarifying and reinforcing the applicability of the erosion and sediment control procedures to both the roadway and bridge/culvert portions of projects and by promoting appropriate disclosure of temporary in-stream work measures in the information submitted for Section 404 permits.

### **Applicability**

The procedures in this memorandum are applicable to all State highway projects.

## **Procedures**

### Section 404 Permit Information Needs

As discussed in Section 28-2, for purposes of evaluating a proposed action under the Section 404 permit program, the U.S. Army Corps of Engineers (USACOE) requires a complete, detailed description of the proposed activity, its purpose, intended use, and drainage area of the watershed to the downstream limit of the project. In all cases, the description submitted for an individual Section 404 permit should include, to the fullest extent practical, information on temporary stream crossings, work pads, temporary bypass channels, cofferdams, etc. that will be involved in the construction work requiring a Section 404 permit.

For nationwide Section 404 permit 14, which addresses linear transportation crossings, the description of the project provided to the USACOE should include information on temporary stream crossings, work pads, temporary bypass channels, cofferdams, etc. to the extent that this information is known or can be anticipated at the time of the permit submittal. If these temporary work features are addressed for permitting purposes after the initial permit submittal, they may be eligible for coverage under nationwide Section 404 permit 33, "Temporary Construction, Access, and Dewatering." It should be recognized that time would be required to obtain separate permit authorization under nationwide permit 33 for the temporary work items. This time factor should be anticipated and factored into the project schedule. To minimize potential disruption of the project implementation schedule, Districts can include in the original permit submittal information reflecting their best estimate of the type, size, and location of temporary work features needed for construction of the bridge/culvert requiring the Section 404 permit. To the extent that this information adequately covers the temporary work features that the contractor ultimately proposes, it will eliminate the need for having the contractor obtain a separate permit authorization for the temporary work and will avoid the associated potential for delays in project implementation.

### Considerations in Structure Planning

As a part of the Preliminary Bridge Investigations for a proposed structure, discussed in Section 39-3.03 of the BDE Manual, consideration should be given to anticipated need for temporary in-stream work features for construction of the project, such as temporary stream crossings, work pads, temporary bypass channels, cofferdams, etc. This information will need to be described in a Section 404 permit submittal to the USACOE for work involving discharge of dredged or fill material into waters of the United States. To the extent that any needed temporary work features can be anticipated and addressed in the permit submittal for the bridge/culvert, it will avoid the need for having the contractor seek separate permit coverage for the temporary work in the construction phase with the associated potential for delaying construction operations while awaiting the permit authorization for the temporary work features.

Erosion and Sediment Control

The policy described in Section 59-8.02 of the BDE Manual for evaluating the need for erosion and sediment control prior to the preparation of design plans, should be understood to apply to construction of both roadway and bridge/culvert components of highway projects.

In gathering information on the location and size of bridges and culverts, as discussed in Section 59-8.04, consideration also must be given to associated need for erosion and sediment control measures to address in-stream work and work affecting the adjacent banks.

The Storm Water Pollution Prevention Plan prepared for projects subject to the NPDES Storm Water Permit for Construction Site Activity must address storm water pollution prevention measures for construction of the roadway and any bridge(s)/culvert(s) included in the project.

Engineer of Design and Environment

Michael L. Hine